

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	
)	Chapter 11
Lordstown Motors Corp., <i>et al.</i> , ¹)	
)	Case No. 23-10831 (MFW)
Debtors.)	(Jointly Administered)
)	
)	

**NOTICE OF *AMENDED*² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON JULY 27, 2023 AT 9:30 A.M. (EDT)**

**THE REMOTE HEARING WILL BE CONDUCTED ENTIRELY BY ZOOM AND
REQUIRES ALL PARTICIPANTS TO REGISTER IN ADVANCE. COURTCALL
WILL NOT BE USED TO DIAL IN.**

PLEASE USE THE FOLLOWING LINK TO REGISTER FOR THE HEARING:

https://debuscourts.zoomgov.com/meeting/register/vJItcO2trDkvE28xi3sRxLQjvEl6Jktb_fe

**ONCE REGISTERED, PARTIES WILL RECEIVE A CONFIRMATION EMAIL
CONTAINING PERSONAL LOG-IN INFORMATION FOR THE HEARING.**

I. ADJOURNED MATTER:

1. Debtors' Application to Retain and Employ Richards, Layton & Finger, P.A. as Co-Counsel Effective as of the Petition Date [[Docket No. 89](#); filed July 6, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 31, 2023 at 4:00 p.m. (EDT) for the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee"); extended to a date to be determined for the Official Committee of Unsecured Creditors (the "Creditors' Committee")

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Amended agenda items appear in bold.

Responses/Objections Received:

- A. Informal comments from the U.S. Trustee
- B. Informal Comments from the Creditors' Committee

Status: The hearing on this matter is continued to a date and time to be determined.

II. MATTERS UNDER A CERTIFICATION OF COUNSEL/NO OBJECTION:

- 2. Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing, the Debtors to (I) Pay Prepetition Wages and Compensation; (II) Continue Certain Employee Benefits and Incentive Programs; (III) Continue Certain Health and Insurance Benefits; and (B) Granting Other Related Relief [[Docket No. 6](#); filed June 27, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors' Committee

Responses/Objections Received: None

Related Documents:

- i. Interim Order (A) Authorizing, But Not Directing, the Debtors to (I) Pay Prepetition Wages and Compensation; (II) Continue Certain Employee Benefits and Incentive Programs; (III) Continue Certain Health and Insurance Benefits; and (B) Granting Other Related Relief [[Docket No. 75](#); filed June 29, 2023]
- ii. Notice of Entry of "Interim Order (A) Authorizing, But Not Directing, the Debtors to (I) Pay Prepetition Wages and Compensation; (II) Continue Certain Employee Benefits and Incentive Programs; (III) Continue Certain Health and Insurance Benefits; and (B) Granting Other Related Relief" and Final Hearing Thereon [[Docket No. 77](#); filed June 29, 2023]
- iii. Amended Interim Order (A) Authorizing, But Not Directing, the Debtors to (I) Pay Prepetition Wages and Compensation; (II) Continue Certain Employee Benefits and Incentive Programs; (III) Continue Certain Health and Insurance Benefits; and (B) Granting Other Related Relief [[Docket No. 106](#); filed July 13, 2023]
- iv. Notice of Entry of "Amended Interim Order (A) Authorizing, But Not Directing, the Debtors to (I) Pay Prepetition Wages and Compensation; (II) Continue Certain Employee Benefits and Incentive Programs; (III) Continue Certain Health and Insurance Benefits; and (B) Granting Other Related Relief" and Final Hearing Thereon [[Docket No. 107](#); filed July 13,

2023]

- v. Supplement to the Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing, the Debtors to (I) Pay Prepetition Wages and Compensation; (II) Continue Certain Employee Benefits and Incentive Programs; (III) Continue Certain Health and Insurance Benefits; and (B) Granting Other Related Relief [[Docket No. 112](#); filed July 13, 2023]
- vi. Certification of No Objection Regarding "Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing, the Debtors to (I) Pay Prepetition Wages and Compensation; (II) Continue Certain Employee Benefits and Incentive Programs; (III) Continue Certain Health and Insurance Benefits; and (B) Granting Other Related Relief" [[Docket No. 150](#); filed July 24, 2023]
- vii. **Final Order (A) Authorizing, But Not Directing, the Debtors to (I) Pay Prepetition Wages and Compensation; (II) Continue Certain Employee Benefits and Incentive Programs; (III) Continue Certain Health and Insurance Benefits; and (B) Granting Other Related Relief [[Docket No. 178](#); filed July 25, 2023]**

Status: On July 25, 2023, the Court entered a final order in connection with this matter. Accordingly, a further hearing with respect to this matter is no longer necessary.

- 3. Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing, the Debtors to (I) Waive Requirements to File a List of, and Provide Notice to, All Equity Holders and (II) Redact Certain Personal Identification Information for Individual Creditors and (B) Granting Other Related Relief [[Docket No. 7](#); filed June 27, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors' Committee

Responses/Objections Received: None

Related Documents:

- i. Interim Order (A) Authorizing, But Not Directing, the Debtors to (I) Waive Requirements to File a List of, and Provide Notice to, All Equity Holders and (II) Redact Certain Personal Identification Information for Individual Creditors and (B) Granting Other Related Relief [[Docket No. 56](#); filed June 28, 2023]

- ii. Notice of Entry of “Interim Order (A) Authorizing, But Not Directing, the Debtors to (I) Waive Requirements to File a List of, and Provide Notice to, All Equity Holders and (II) Redact Certain Personal Identification Information for Individual Creditors and (B) Granting Other Related Relief” and Final Hearing Thereon [[Docket No. 65](#); filed June 28, 2023]
- iii. Certification of Counsel Regarding “Final Order (A) Authorizing, But Not Directing, the Debtors to (I) Waive Requirements to File a List of, and Provide Notice to, All Equity Holders and (II) Redact Certain Personal Identification Information for Individual Creditors and (B) Granting Other Related Relief” [[Docket No. 161](#); filed July 24, 2023]
- iv. **Final Order (A) Authorizing, But Not Directing, the Debtors to (I) Waive Requirements to File a List of, and Provide Notice to, All Equity Holders and (II) Redact Certain Personal Identification Information for Individual Creditors and (B) Granting Other Related Relief** [[Docket No. 184](#); filed July 25, 2023]

Status: **On July 25, 2023, the Court entered a final order in connection with this matter. Accordingly, a further hearing with respect to this matter is no longer necessary.**

- 4. Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing, the Debtors to (I) Continue Use of Existing Cash Management System, Bank Accounts, and Business Forms, (II) Pay Related Prepetition Obligations, and (III) Continue Intercompany Transactions; (B) Waiving the Section 345(b) Deposit and Investment Requirements; and (C) Granting Other Related Relief [[Docket No. 8](#); filed June 27, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the U.S. Trustee and the Creditors’ Committee

Responses/Objections Received:

- A. Informal comments from JPMorgan Chase Bank, N.A.

Related Documents:

- i. Interim Order (A) Authorizing, But Not Directing, the Debtors to (I) Continue Use of Existing Cash Management System, Bank Accounts, and Business Forms, (II) Pay Related Prepetition Obligations, and (III) Continue Intercompany Transactions; (B) Waiving the Section 345(b) Deposit and Investment Requirements; and (C) Granting Other Related Relief [[Docket No. 57](#); filed June 28, 2023]

- ii. Notice of Entry of “Interim Order (A) Authorizing, But Not Directing, the Debtors to (I) Continue Use of Existing Cash Management System, Bank Accounts, and Business Forms, (II) Pay Related Prepetition Obligations, and (III) Continue Intercompany Transactions; (B) Waiving the Section 345(b) Deposit and Investment Requirements; and (C) Granting Other Related Relief” and Final Hearing Thereon [[Docket No. 66](#); filed June 28, 2023]
- iii. Certification of Counsel Regarding “Final Order (A) Authorizing, But Not Directing, the Debtors to (I) Continue Use of Existing Cash Management System, Bank Accounts, and Business Forms, (II) Pay Related Prepetition Obligations, and (III) Continue Intercompany Transactions; (B) Waiving the Section 345(b) Deposit and Investment Requirements; and (C) Granting Other Related Relief” [[Docket No. 169](#); filed July 25, 2023]
- iv. **Final Order (A) Authorizing, But Not Directing, the Debtors to (I) Continue Use of Existing Cash Management System, Bank Accounts, and Business Forms, (II) Pay Related Prepetition Obligations, and (III) Continue Intercompany Transactions; (B) Waiving the Section 345(b) Deposit and Investment Requirements; and (C) Granting Other Related Relief** [[Docket No. 187](#); filed July 25, 2023]

Status: On July 25, 2023, the Court entered a final order in connection with this matter. Accordingly, a further hearing with respect to this matter is no longer necessary.

- 5. Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing, the Debtors to Pay Prepetition Claims of Critical Vendors, (B) Confirming Administrative Expense Priority Status for Outstanding Prepetition Purchase Orders, and (C) Granting Other Related Relief [[Docket No. 9](#); filed June 27, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors’ Committee

Responses/Objections Received:

- A. Informal comments from the Creditors’ Committee

Related Documents:

- i. Interim Order (A) Authorizing, But Not Directing, the Debtors to Pay Prepetition Claims of Critical Vendors, (B) Confirming Administrative Expense Priority Status for Outstanding Prepetition Purchase Orders, and (C) Granting Other Related Relief [[Docket No. 58](#); filed June 28, 2023]

- ii. Notice of Entry of “Interim Order (A) Authorizing, But Not Directing, the Debtors to Pay Prepetition Claims of Critical Vendors, (B) Confirming Administrative Expense Priority Status for Outstanding Prepetition Purchase Orders, and (C) Granting Other Related Relief” and Final Hearing Thereon [[Docket No. 67](#); filed June 28, 2023]
- iii. Certification of Counsel Regarding “Final Order (A) Authorizing, But Not Directing, the Debtors to Pay Prepetition Claims of Critical Vendors, (B) Confirming Administrative Expense Priority Status for Outstanding Prepetition Purchase Orders, and (C) Granting Other Related Relief” [[Docket No. 164](#); filed July 24, 2023]
- iv. **Final Order (A) Authorizing, But Not Directing, the Debtors to Pay Prepetition Claims of Critical Vendors, (B) Confirming Administrative Expense Priority Status for Outstanding Prepetition Purchase Orders, and (C) Granting Other Related Relief** [[Docket No. 185](#); filed July 25, 2023]

Status: On July 25, 2023, the Court entered a final order in connection with this matter. Accordingly, a further hearing with respect to this matter is no longer necessary.

- 6. Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing, But Not Directing, the Payment of Certain Prepetition Taxes and Fees and (II) Granting Other Related Relief [[Docket No. 10](#); filed June 27, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors’ Committee

Responses/Objections Received: None

Related Documents:

- i. Interim Order (I) Authorizing, But Not Directing, the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief [[Docket No. 59](#); filed June 28, 2023]
- ii. Notice of Entry of “Interim Order (I) Authorizing, But Not Directing, the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief” and Final Hearing Thereon [[Docket No. 68](#); filed June 28, 2023]
- iii. Certification of No Objection Regarding “Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing, But Not Directing, the Payment of Certain Prepetition Taxes and Fees and (II) Granting Other Related Relief” [[Docket No. 149](#); filed July 24, 2023]

- iv. **Final Order (I) Authorizing, But Not Directing, the Debtors to Pay Certain Prepetition Taxes and Fees and (II) Granting Other Related Relief** [[Docket No. 177](#); filed July 25, 2023]

Status: **On July 25, 2023, the Court entered a final order in connection with this matter. Accordingly, a further hearing with respect to this matter is no longer necessary.**

7. Debtors' Motion for Entry of Interim and Final Orders (A) Approving the Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers, (B) Establishing Procedures for Resolving Objections by Utility Providers, (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, and (D) Granting Other Related Relief [[Docket No. 11](#); filed June 27, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors' Committee

Responses/Objections Received: None

Related Documents:

- i. Interim Order (A) Approving the Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers, (B) Establishing Procedures for Resolving Objections by Utility Providers, (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, and (D) Granting Other Related Relief [[Docket No. 60](#); filed June 28, 2023]
- ii. Notice of Entry of "Interim Order (A) Approving the Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers, (B) Establishing Procedures for Resolving Objections by Utility Providers, (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, and (D) Granting Other Related Relief" and Final Hearing Thereon [[Docket No. 69](#); filed June 28, 2023]
- iii. Certification of Counsel Regarding "Final Order (A) Approving the Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers, (B) Establishing Procedures for Resolving Objections by Utility Providers, (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, and (D) Granting Other Related Relief" [[Docket No. 167](#); filed July 25, 2023]

- iv. **Final Order (A) Approving the Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers, (B) Establishing Procedures for Resolving Objections by Utility Providers, (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, and (D) Granting Other Related Relief** [[Docket No. 183](#); filed July 25, 2023]

Status: **On July 25, 2023, the Court entered a final order in connection with this matter. Accordingly, a further hearing with respect to this matter is no longer necessary.**

- 8. Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing the Debtors to (I) Maintain Existing Insurance Policies and Pay all Insurance Obligations Arising Thereunder and (II) Renew, Revise, Extend, Supplement, Change or Enter into New Insurance Policies, (B) Modifying Automatic Stay with Respect to Workers' Compensation Programs, and (C) Granting Other Related Relief [[Docket No. 12](#); filed June 27, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors' Committee

Responses/Objections Received: None

Related Documents:

- i. Interim Order (A) Authorizing, But Not Directing the Debtors to (I) Maintain Existing Insurance Policies and Pay all Insurance Obligations Arising Thereunder and (II) Renew, Revise, Extend, Supplement, Change or Enter into New Insurance Policies, (B) Modifying the Automatic Stay with Respect to Workers' Compensation Programs, and (C) Granting Other Related Relief [[Docket No. 61](#); filed June 28, 2023]
- ii. Notice of Entry of "Interim Order (A) Authorizing, But Not Directing the Debtors to (I) Maintain Existing Insurance Policies and Pay all Insurance Obligations Arising Thereunder and (II) Renew, Revise, Extend, Supplement, Change or Enter into New Insurance Policies, (B) Modifying the Automatic Stay with Respect to Workers' Compensation Programs, and (C) Granting Other Related Relief" and Final Hearing Thereon [[Docket No. 70](#); filed June 28, 2023]

- iii. Certification of No Objection Regarding “Debtors” Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing the Debtors to (I) Maintain Existing Insurance Policies and Pay all Insurance Obligations Arising Thereunder and (II) Renew, Revise, Extend, Supplement, Change or Enter into New Insurance Policies, (B) Modifying Automatic Stay with Respect to Workers’ Compensation Programs, and (C) Granting Other Related Relief” [[Docket No. 151](#); filed July 24, 2023]
- iv. **Final Order (A) Authorizing, But Not Directing the Debtors to (I) Maintain Existing Insurance Policies and Pay all Insurance Obligations Arising Thereunder and (II) Renew, Revise, Extend, Supplement, Change or Enter into New Insurance Policies, (B) Modifying Automatic Stay with Respect to Workers’ Compensation Programs, and (C) Granting Other Related Relief** [[Docket No. 179](#); filed July 25, 2023]

Status: **On July 25, 2023, the Court entered a final order in connection with this matter. Accordingly, a further hearing with respect to this matter is no longer necessary.**

- 9. Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing, the Debtors to (I) Maintain their Existing Warranty Programs and (II) Honor Certain Customer Obligations and (B) Granting Other Related Relief [[Docket No. 13](#); filed June 27, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors’ Committee

Responses/Objections Received:

- A. Informal comments from the Creditors’ Committee

Related Documents:

- i. Interim Order (A) Authorizing, But Not Directing, Authorizing, But Not Directing, the Debtors to (I) Maintain their Existing Warranty Programs and (II) Honor Certain Customer Obligations and (B) Granting Other Related Relief [[Docket No. 62](#); filed June 28, 2023]
- ii. Notice of Entry of “Interim Order (A) Authorizing, But Not Directing, the Debtors to (I) Maintain their Existing Warranty Programs and (II) Honor Certain Customer Obligations and (B) Granting Other Related Relief” and Final Hearing Thereon [[Docket No. 71](#); filed June 28, 2023]

- iii. Certification of Counsel Regarding “Final Order (A) Authorizing, But Not Directing, the Debtors to (I) Maintain their Existing Warranty Programs and (II) Honor Certain Customer Obligations and (B) Granting Other Related Relief” [[Docket No. 168](#); filed July 25, 2023]
- iv. **Final Order (A) Authorizing, But Not Directing, the Debtors to (I) Maintain their Existing Warranty Programs and (II) Honor Certain Customer Obligations and (B) Granting Other Related Relief** [[Docket No. 186](#); filed July 25, 2023]

Status: **On July 25, 2023, the Court entered a final order in connection with this matter. Accordingly, a further hearing with respect to this matter is no longer necessary.**

- 10. Debtors’ Motion for Entry of Interim and Final Orders (A) Establishing Notice and Hearing Procedures for Trading in Equity Securities in the Debtors and (B) Granting Other Related Relief [[Docket No. 14](#); filed June 27, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors’ Committee

Responses/Objections Received: None

Related Documents:

- i. Interim Order (A) Establishing Notice and Hearing Procedures for Trading in Equity Securities in the Debtors and (B) Granting Other Related Relief [[Docket No. 63](#); filed June 28, 2023]
- ii. Notice of Entry of “Interim Order (A) Establishing Notice and Hearing Procedures for Trading in Equity Securities in the Debtors and (B) Granting Other Related Relief” and Final Hearing Thereon [[Docket No. 72](#); filed June 28, 2023]
- iii. Notice of Interim Order (A) Establishing Notice and Hearing Procedures for Trading Equity Securities in the Debtors and (B) Granting Other Related Relief [[Docket No. 81](#); filed June 30, 2023]
- iv. Supplemental Declaration of Adam Kroll in Support of Debtors; Motion for Entry of Interim and Final Orders (A) Establishing Notice and Hearing Procedures for Trading Equity Securities in the Debtors, and (B) Granting Other Related Relief [[Docket No. 153](#); filed July 24, 2023]
- v. Certification of No Objection Regarding “Debtors’ Motion for Entry of Interim and Final Orders (A) Establishing Notice and Hearing Procedures for Trading in Equity Securities in the Debtors and (B) Granting Other Related Relief” [[Docket No. 165](#); filed July 25, 2023]

- vi. **Final Order (A) Establishing Notice and Hearing Procedures for Trading in Equity Securities in the Debtors and (B) Granting Other Related Relief** [[Docket No. 180](#); filed July 25, 2023]

Status: **On July 25, 2023, the Court entered an order in connection with this matter. Accordingly, a hearing with respect to this matter is no longer necessary.**

11. Debtors' Application for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Attorneys to the Debtors Effective as of the Petition Date [[Docket No. 87](#); filed July 6, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors' Committee

Responses/Objections Received:

- A. Questions from the U.S. Trustee

Related Documents:

- i. Certification of No Objection Regarding "Debtors' Application for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Attorneys to the Debtors Effective as of the Petition Date" [[Docket No. 148](#); filed July 24, 2023]
- ii. **Order Authorizing the Employment and Retention of White & Case LLP as Attorneys to the Debtors Effective as of the Petition Date** [[Docket No. 175](#); filed July 25, 2023]

Status: **On July 25, 2023, the Court entered an order in connection with this matter. Accordingly, a hearing with respect to this matter is no longer necessary.**

12. Debtors' Application for Entry of an Order (A) Authorizing the Retention and Employment of Jefferies LLC as Investment Banker for the Debtors and Debtors in Possession Pursuant to 11 U.S.C. §§ 327(a) and 328(a), Effective as of the Petition Date and (B) Waiving Certain Time-Keeping Requirements [[Docket No. 88](#); filed July 6, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors' Committee

Responses/Objections Received:

- A. Informal comments from the U.S. Trustee

B. Informal comments from the Creditors' Committee

Related Documents:

- i. Declaration of Jeffrey Finger in Support of Application of Debtors for Entry of an Order (I) Authorizing the Employment and Retention of Jefferies LLC as Investment Banker for the Debtors Effective as of the Petition Date, and (II) Waiving Certain Time-Keeping Requirements, and (III) Granting Related Relief [[Docket No. 152](#); filed July 24, 2023]
- ii. Certification of Counsel Concerning Order (A) Authorizing the Retention and Employment of Jefferies LLC as Investment Banker for the Debtors and Debtors in Possession Pursuant to 11 U.S.C. §§ 327(a) and 328(a), Effective as of the Petition Date and (B) Waiving Certain Time-Keeping Requirements [[Docket No. 162](#); filed July 24, 2023]
- iii. **Order (A) Authorizing the Retention and Employment of Jefferies LLC as Investment Banker for the Debtors and Debtors in Possession Pursuant to 11 U.S.C. §§ 327(a) and 328(a), Effective as of the Petition Date and (B) Waiving Certain Time-Keeping Requirements** [[Docket No. 188](#); filed July 25, 2023]

Status: **On July 25, 2023, the Court entered an order in connection with this matter. Accordingly, a hearing with respect to this matter is no longer necessary.**

13. Debtors' Application for Entry of an Order Authorizing the Debtors to Employ and Retain Silverman Consulting as Restructuring Advisor Effective as of the Petition Date [[Docket No. 90](#); filed July 6, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors' Committee

Responses/Objections Received:

A. Questions from the U.S. Trustee

Related Documents:

- i. Certification of No Objection Regarding "Debtors' Application for Entry of an Order Authorizing the Debtors to Employ and Retain Silverman Consulting as Restructuring Advisor Effective as of the Petition Date" [[Docket No. 147](#); filed July 24, 2023]

- ii. **Order Authorizing the Debtors to Employ and Retain Silverman Consulting as Restructuring Advisor Effective as of the Petition Date** [[Docket No. 176](#); filed July 25, 2023]

Status: On July 25, 2023, the Court entered an order in connection with this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

- 14. Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Kurtzman Carson Consultants LLC as Administrative Advisor Effective as of the Petition Date [[Docket No. 91](#); filed July 6, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors' Committee

Responses/Objections Received: None

Related Documents:

- i. Certification of No Objection Regarding "Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Kurtzman Carson Consultants LLC as Administrative Advisor Effective as of the Petition Date" [[Docket No. 146](#); filed July 24, 2023]
- ii. **Order Authorizing the Employment and Retention of Kurtzman Carson Consultants LLC as Administrative Advisor Effective as of the Petition Date** [[Docket No. 174](#); filed July 25, 2023]

Status: On July 25, 2023, the Court entered an order in connection with this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

- 15. Debtors' Motion for Entry of an Order (A) Extending Time to File (I) Schedules of Assets and Liabilities, (II) Schedules of Current Income and Expenditures, (III) Schedules of Executory Contracts and Unexpired Leases, and (IV) Statement of Financial Affairs and (B) Granting Other Related Relief [[Docket No. 109](#); filed July 13, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Committee

Responses/Objections Received: None

Related Documents:

- i. Certification of No Objection Regarding “Debtors’ Motion for Entry of an Order (A) Authorizing, But Not Directing, the Debtors to Extend Time to File (I) Schedules of Assets and Liabilities, (II) Schedules of Current Income and Expenditures, (III) Schedules of Executory Contracts and Unexpired Leases, and (IV) Statements of Financial Affairs and (B) Granting Other Related Relief” [[Docket No. 145](#); filed July 24, 2023]
- ii. **Order (A) Extending Time to File (I) Schedules of Assets and Liabilities, (II) Schedules of Current Income and Expenditures, (III) Schedules of Executory Contracts and Unexpired Leases, and (IV) Statements of Financial Affairs and (B) Granting Other Related Relief** [[Docket No. 173](#); filed July 25, 2023]

Status: **On July 25, 2023, the Court entered an order in connection with this matter. Accordingly, a hearing with respect to this matter is no longer necessary.**

16. Debtors’ Motion for Entry of an Order (A) Authorizing the Retention and Payment of Professionals Utilized in the Ordinary Course of Business and (B) Granting Other Related Relief [[Docket No. 110](#); filed July 13, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors’ Committee

Responses/Objections Received:

- A. Informal comments from the U.S. Trustee
- B. Informal comments from the Creditors’ Committee

Related Documents:

- i. Certification of Counsel Concerning Order (A) Authorizing the Retention and Payment of Professionals Utilized in the Ordinary Course of Business and (B) Granting Other Related Relief” [[Docket No. 166](#); filed July 25, 2023]
- ii. **Order (A) Authorizing the Retention and Payment of Professionals Utilized in the Ordinary Course of Business and (B) Granting Other Related Relief** [[Docket No. 182](#); filed July 25, 2023]

Status: **On July 25, 2023, the Court entered an order in connection with this matter. Accordingly, a hearing with respect to this matter is no longer necessary.**

17. Debtors' Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals and Committee Members [[Docket No. 111](#); filed July 13, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors' Committee

Responses/Objections Received:

- A. Informal comments from the U.S. Trustee

Related Documents:

- i. Certification of Counsel Concerning Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals and Committee Members [[Docket No. 163](#); filed July 24, 2023]
- ii. **Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals and Committee Members** [[Docket No. 181](#); filed July 25, 2023]

Status: **On July 25, 2023, the Court entered an order in connection with this matter. Accordingly, a hearing with respect to this matter is no longer necessary.**

III. CONTESTED MATTERS GOING FORWARD:

18. Debtors' Motion for Entry of an Order (I) (A) Establishing Bidding and Auction Procedures, (B) Scheduling Certain Dates with Respect Thereto, (C) Approving the Form and Manner of Notice Thereof, (D) Approving Contract Assumption and Assignment Procedures, and (E) Granting Other Related Relief; and (II) (A) Authorizing the Debtors to Enter into a Definitive Purchase Agreement and (B) Granting Other Related Relief [[Docket No. 16](#); filed June 27, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors' Committee

Responses/Objections Received:

- A. Objection to Debtors' Motion for Entry of an Order (I) (A) Establishing Bidding and Auction Procedures, (B) Scheduling Certain Dates with Respect Thereto, (C) Approving the Form and Manner of Notice Thereof, (D) Approving Contract Assumption and Assignment Procedures, and (E) Granting Other Related Relief; and (II) (A) Authorizing the Debtors to Enter into a Definitive Purchase Agreement and (B) Granting Other

Related Relief filed by Karma Automotive LLC [[Docket No. 127](#); filed July 20, 2023]

- B. Informal comments from the U.S. Trustee
- C. Informal comments from the Creditors' Committee
- D. Informal comments from Cigna Health and Life Insurance Company

Related Documents:

- i. Notice of "Debtors' Motion for Entry of an Order (I) (A) Establishing Bidding and Auction Procedures, (B) Scheduling Certain Dates with Respect Thereto, (C) Approving the Form and Manner of Notice Thereof, (D) Approving Contract Assumption and Assignment Procedures, and (E) Granting Other Related Relief; and (II) (A) Authorizing the Debtors to Enter into a Definitive Purchase Agreement and (B) Granting Other Related Relief" [D.I. 16] and Hearing Thereon [[Docket No. 73](#); filed June 28, 2023]
- ii. Reply in Support of the Debtors' Motion for Entry of an Order (I) (A) Establishing Bidding and Auction Procedures, (B) Scheduling Certain Dates with Respect Thereto, (C) Approving the Form and Manner of Notice Thereof, (D) Approving Contract Assumption and Assignment Procedures, and (E) Granting Other Related Relief; and (II) (A) Authorizing the Debtors to Enter into a Definitive Purchase Agreement and (B) Granting Other Related Relief [[Docket No. 154](#); filed July 24, 2023]
- iii. Declaration of Adam Kroll in Support of the Debtors' (I) Reply in Support of the Bidding Procedures Motion and (II) Reply in Support of the Estimation Motion [[Docket No. 156](#); filed July 24, 2023]
- iv. Declaration of Jeffrey Finger in Support of the Debtors' (I) Reply in Support of the Bidding Procedures Motion and (II) Reply in Support of the Estimation Motion [[Docket No. 157](#); filed July 24, 2023]
- v. Debtors' Motion for Leave to File Debtors' (A) Bidding Procedures Motion Reply and (B) Estimation Motion Reply [[Docket No. 158](#); filed July 24, 2023]
- vi. Notice of Filing of Revised Proposed Order (A) Establishing Bidding and Auction Procedures, (B) Scheduling Certain Dates with Respect Thereto, (C) Approving the Form and Manner of Notice Thereof, (D) Approving Contract Assumption and Assignment Procedures, and (E) Granting Other Related Relief [[Docket No. 159](#); filed July 24, 2023] (the "Notice of Filing")

- vii. **Declaration of Adam Kroll in Support of Debtors' Chapter 11 Petitions and First Day Motions** [[Docket No. 15](#); filed June 27, 2023]
- viii. **Karma Automotive LLC's Witness List and Exhibit List for Hearing** [[Docket No. 172](#); filed July 25, 2023]

Witness Information:

Debtors' Witnesses:

- i. Adam Kroll, Executive Vice President and Chief Financial Officer of Lordstown Motors, Farmington Hills, Michigan
- ii. Jeffrey Finger, Managing Director and Co-Head of US Debt Advisory & Restructuring at Jefferies LLC, New York, New York

Karma Automotive LLC Witness:

- i. **Michael D. Wexler, partner of Seyfarth Shaw LLP, Chicago, Illinois**

Status: As reflected in the Notice of Filing, the Debtors have resolved the informal comments of the U.S. Trustee, the Creditors' Committee, and Cigna Health and Life Insurance Company. The objection of Karma Automotive LLC ("Karma") remains outstanding. The hearing on this matter will go forward on a contested basis as it relates to Karma's outstanding objection.

- 19. Karma Automotive LLC's Motion for Relief from the Automatic Stay [[Docket No. 82](#); filed July 5, 2023]

Response/Objection Deadline: July 19, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors' Committee

Responses/Objections Received:

- A. Debtors' Objection to Karma Automotive LLC's Motion for Relief from the Automatic Stay [[Docket No. 122](#); filed July 19, 2023]
- B. The Official Committee of Unsecured Creditors' Objection to Karma Automotive LLC's Motion for Relief from the Automatic Stay [[Docket No. 128](#); filed July 20, 2023]

Related Documents:

- i. Declaration of Michael D. Wexler in Support of Motion for Relief from the Automatic Stay [[Docket No. 83](#); filed July 5, 2023]

- ii. Declaration of Adam Kroll in Support of the Debtors' Objection to Karma Automotive LLC's Motion for Relief from the Automatic Stay [[Docket No. 123](#); filed July 19, 2023]
- iii. Notice of Filing of Exhibit B to Debtors' Objection to Karma Automotive LLC's Motion for Relief from the Automatic Stay (SEALED) [Docket No. 124; filed July 19, 2023]
- iv. Karma Automotive LLC's Reply in Support of Motion for Relief from the Automatic Stay [[Docket No. 144](#); filed July 24, 2023]
- v. Debtors' Motion for Entry of an Order Authorizing Debtors to File Under Seal Exhibit B to the Debtors' Objection to Karma Automotive LLC's Motion for Relief from the Automatic Stay [[Docket No. 160](#); filed July 24, 2023]
- vi. **Karma Automotive LLC's Witness List and Exhibit List for Hearing** [[Docket No. 172](#); filed July 25, 2023]

Witness Information:

Debtors' Witness:

- i. Adam Kroll, Executive Vice President and Chief Financial Officer of Lordstown Motors, Farmington Hills, Michigan

Karma Automotive LLC Witness:

- i. Michael D. Wexler, partner of Seyfarth Shaw LLP, Chicago, Illinois

Status: The hearing on this matter will go forward on a contested basis.

- 20. Debtors' Motion Under 11 U.S.C. §§ 502(c) and 105(a) for Entry of Orders (I) Establishing Procedures and Schedule for Estimation Proceedings and (II) Estimation of the Amount of the Claim held by Karma Automotive LLC [[Docket No. 108](#); filed July 13, 2023]

Response/Objection Deadline: July 20, 2023 at 4:00 p.m. (EDT); extended to July 24, 2023 at 11:00 a.m. (EDT) for the Creditors' Committee

Responses/Objections Received:

- A. Preliminary Objection to Debtors' Motion Under 11 U.S.C. §§ 502(c) and 105(a) for Entry of Orders (I) Establishing Procedures and Schedule for Estimation Proceedings and (II) Estimation of the Amount of the Claim held by Karma Automotive LLC [[Docket No. 126](#); filed July 20, 2023]

- B. Statement of the Official Committee of Unsecured Creditors Regarding Debtors' Motion Under 11 U.S.C. §§ 502(c) and 105(a) for Entry of Orders (I) Establishing Procedures and Schedule for Estimation Proceedings and (II) Estimation of the Amount of the Claim held by Karma Automotive LLC [[Docket No. 143](#); filed July 24, 2023]

Related Documents:

- i. Debtors' Reply in Support of the Debtors' Motion Under 11 U.S.C. §§ 502(c) and 105(a) for Entry of Orders (I) Establishing Procedures and Schedule for Estimation Proceedings and (II) Estimation of the Amount of the Claim held by Karma Automotive LLC [[Docket No. 155](#); filed July 24, 2023]
- ii. Declaration of Adam Kroll in Support of the Debtors' (I) Reply in Support of the Bidding Procedures Motion and (II) Reply in Support of the Estimation Motion [[Docket No. 156](#); filed July 24, 2023]
- iii. Declaration of Jeffrey Finger in Support of the Debtors' (I) Reply in Support of the Bidding Procedures Motion and (II) Reply in Support of the Estimation Motion [[Docket No. 157](#); filed July 24, 2023]
- iv. Debtors' Motion for Leave to File Debtors' (A) Bidding Procedures Motion Reply and (B) Estimation Motion Reply [[Docket No. 158](#); filed July 24, 2023]
- v. **Karma Automotive LLC's Witness List and Exhibit List for Hearing** [[Docket No. 172](#); filed July 25, 2023]

Witness Information:

Debtors' Witnesses:

- i. Adam Kroll, Executive Vice President and Chief Financial Officer of Lordstown Motors, Farmington Hills, Michigan
- ii. Jeffrey Finger, Managing Director and Co-Head of US Debt Advisory & Restructuring at Jefferies LLC, New York, New York

Karma Automotive LLC Witness:

- i. **Michael D. Wexler, partner of Seyfarth Shaw LLP, Chicago, Illinois**

Status: The hearing on this matter will go forward on a contested basis.

Dated: July 25, 2023

Respectfully submitted,

/s/ Jason M. Madron

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